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9
10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE EASTERN DISTRICT OF CALIFORNIA
12

13 **ONLINE MERCHANTS GUILD,**

14 Plaintiff,

15 v.

16 **NICOLAS MADUROS, DIRECTOR,**
17 **CALIFORNIA DEPARTMENT OF TAX**
18 **& FEE ADMINISTRATION,**

19 Defendant.
20
21

2:20-cv-01952-MCE-DB

**REQUEST TO EXTEND
CONFIDENTIALITY SEALING ORDER**

Judge: The Honorable Morrison C.
England, Jr.

Trial Date: Not Set

Action Filed: September 29, 2020

22 On April 15, 2021, the Court ordered that the opposition to preliminary injunction
23 filed on April 2, 2021 by defendant Nicolas Maduros, Director, California Department of
24 Tax and Fee Administration, and Exhibits A and B to the declaration of Theresa Nixon in
25 support of that opposition brief, be filed under seal pursuant to Civil Local Rule 141.
26 (Docket No. 36.) Director Maduros respectfully requests that the court extend the order
27 sealing those documents.
28

1 Exhibits A and B to the Nixon Declaration were produced by third party
2 Amazon.com, Inc. in response to a subpoena. Exhibits A and B contain information
3 about the sales and shipments of third party merchants who use Amazon.com to sell
4 their goods. Amazon designated Exhibits A and B as confidential when Amazon
5 produced these documents because they contain confidential and proprietary
6 information relating to third party merchants, including specific details about sales and
7 shipment data. Director Maduros's opposition brief included some of the confidential
8 information contained in Exhibits A and B. A redacted version of the opposition brief
9 was filed in the public record. (Docket No. 28.)

10 Amazon has recently informed Director Maduros that the proprietary and
11 confidential nature of this information has not abated. For that reason, and for the
12 reasons articulated in Defendant's original Request to Seal Documents (Docket No. 31),
13 Director Maduros respectfully requests that the order sealing his Exhibits A and B be
14 extended.

15 Dated: April 26, 2022

Respectfully submitted,

16 ROB BONTA
17 Attorney General of California
18 MOLLY K. MOSLEY
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20 By: /s/ Michael Sapoznikow
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21 Deputy Attorney General

22 *Attorneys for Defendant Nicolas*
23 *Maduros, Director, California Department*
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